



NDA 50-791/S-018 and S-019

## SUPPLEMENT APPROVAL-REMS MODIFICATION

Novartis Pharmaceuticals Corp.  
Attention: M. Daniel Gordin, PhD  
Executive Director, Drug Regulatory Affairs  
One Health Plaza  
East Hanover, NJ 07936-1080

Dear Dr. Gordin:

Please refer to your Supplemental New Drug Applications NDA 50791/S-018 and NDA 50791/S-019 dated and received on August 16, 2013, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Myfortic® (mycophenolic acid) Delayed-Release Tablets.

We acknowledge receipt of your amendment dated September 16, 2013 for NDA 50791/S019.

NDA 50791/S-018 "Prior Approval" supplemental new drug application provides for revisions to the **WARNINGS** and **ADVERSE REACTIONS** sections, various editorial changes of the package insert and NDA 50791/S-019 proposed modifications to the approved REMS.

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

### CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(1)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the enclosed labeling (text for the package insert, Medication Guide), with the addition of any labeling changes in pending "Changes Being Effected" (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

Information on submitting SPL files using eList may be found in the guidance for industry titled "SPL Standard for Content of Labeling Technical Qs and As at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

We request that the labeling approved today be available on your website within 10 days of receipt of this letter.

### **RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS**

The REMS for Myfortic® (mycophenolic acid) was originally approved on September 25, 2012. The REMS consists of a Medication Guide, elements to assure safe use, and a timetable for submission of assessments of the REMS. Your proposed modification to the REMS consists of revisions to the Medication Guide, the shared Important Safety Information (ISI) included in the Dear Healthcare Provider (DHCP) Introductory Letter and DHCP Letter to Centers, and the Mycophenolate REMS website to include information about the risk of reactivation of hepatitis B and hepatitis C virus.

NDA 50791/S-019 proposed modification to the REMS submitted on August 16, 2013, and amended on September 16, 2013, is approved as appended to this letter.

The timetable for submission of assessments of the REMS will remain the same as that approved on September 25, 2012.

There are no changes to the REMS assessment plan described in our September 25, 2012 letter.

This REMS uses a single, shared system for the elements to assure safe use. The individual sponsors who are part of the single, shared system are collectively referred to as “mycophenolate sponsors.” This single shared system, known as the Mycophenolate REMS program, includes the products listed in Appendix 1. Other products may be added in the future if additional NDAs or ANDs are approved.

We remind you that section 505-1(f)(8) of FDCA prohibits holders of an approved covered application with elements to assure safe use from using any element to block or delay approval of an application under section 505(b)(2) or (j). A violation of this provision in 505-1(f) could result in enforcement action.

The requirements for assessments of an approved REMS under section 505-1(g)(3) include, with respect to each goal included in the strategy, an assessment of the extent to which the approved

strategy, including each element of the strategy, is meeting the goal or whether one or more such goals or such elements should be modified.

In addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of the FDCA.

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

**NDA/BLA ##### REMS CORRESPONDENCE  
(insert concise description of content in bold capital letters, e.g.,  
UPDATE TO REMS SUPPORTING DOCUMENT - ASSESSMENT  
METHODOLOGY**

An authorized generic drug under this NDA must have an approved REMS prior to marketing. Should you decide to market, sell, or distribute an authorized generic drug under this NDA, contact us to discuss what will be required in the authorized generic drug REMS submission.

Prominently identify the submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

**NDA ##### REMS ASSESSMENT**

**NEW SUPPLEMENT FOR NDA #####  
PROPOSED REMS MODIFICATION**

**NEW SUPPLEMENT (NEW INDICATION FOR USE)  
FOR NDA #####  
REMS ASSESSMENT  
PROPOSED REMS MODIFICATION (if included)**

If you do not submit electronically, please send 5 copies of REMS-related submissions.

## **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Prescription Drug Promotion  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the address above or by fax to 301-847-8444.

## **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Ms. June Germain, Acting Safety Regulatory Project Manager, at (301) 796-4024.

Sincerely,

*{See appended electronic signature page}*

Ozlem Belen, MD, MPH  
Deputy Director for Safety  
Division of Transplant and Ophthalmology Products  
Office of Antimicrobial Products  
Center for Drug Evaluation and Research

ENCLOSURE(S):

Content of Labeling

REMS

Appendix 1

-----  
**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
-----

/s/  
-----

OZLEM A BELEN  
09/27/2013